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**Cities and the
Environment**

Letter to the Editor

ensure progress toward our goal of cleaner air for all American cities. New planning efforts for meeting the ozone or carbon-monoxide standards must begin without delay."

With regard to revision of the clean-air plans, EPA believes that, even before the issuance of a final policy, the states should take certain fundamental steps necessary to continue to make progress in attaining the ozone or carbon-monoxide standards. The states will be required to correct discrepancies between EPA's guidance and the earlier approved State Implementation Plans; to satisfy any unfulfilled commitments in the State Implementation Plan to adopt control measures; and to begin updating the base-year emissions inventory for the defined planning area.

WATER

Acid Rain in Eastern Streams

EPA has said that 2.7 percent (5,429 kilometers) of the combined length of the 500 streams recently surveyed were acidic, with the large majority of the acidity most likely due to acid rain.

This figure is a result of a major research effort to survey streams in the mid-Atlantic and southeastern United States for acid rain damage.

The Agency found that 4.4 percent of the combined length of streams surveyed in the mid-Atlantic were acidic and that almost half (47.6 percent) had a low capacity to neutralize acid and thus might become acidic in the future. Only 0.6 percent of the combined length of streams in the southeastern portion of the survey were acidic, but 49.3 percent had a low capacity to neutralize acidity.

According to Courtney Riordan, Director of the Agency's Office of

Environmental Processes and Effects, "EPA's stream survey is a fully documented, statistically designed survey showing a broader geographical extent of environmental effects from acid rain than we previously realized."

TOXICS

EPA Fines DeLonghi

The Agency has entered into a consent agreement and final order with DeLonghi America, Inc., which requires the company to pay a civil penalty of \$500,000 for importing and exporting oil-filled radiator heaters contaminated with polychlorinated biphenyls (PCBs). The agreement also requires DeLonghi to establish consumer and retailer programs for those who own the PCB-contaminated heaters.

As part of the consent agreement, DeLonghi will send out notices to approximately 70,000 warranty card holders of oil-filled radiator heaters that were manufactured before June 1986 and have the model numbers 5108, 5108T, or 5307. The notices mention that DeLonghi heaters with the serial number 86-20 or lower contain recycled oil and may be contaminated with PCBs. DeLonghi also agreed to set up a toll-free telephone line by the end of June to help consumers and retailers with their questions about the heaters.

DeLonghi imported for domestic sale 485,000 oil-filled radiator heaters, some of which were contaminated with PCBs. DeLonghi then exported approximately 37,500 radiator heaters, some of which were PCB-contaminated. □

Dear Editor:

We wish to take issue with the April 1988 edition of the *EPA Journal* (Vol. 14, No. 3), nominally dedicated to "Agriculture and the Environment."

We were amazed to see that the *Journal* failed to even address a major environmental problem affecting a substantial part of our population: pesticide exposure of farmworkers. Farm laborers are mentioned twice, in passing, in 41 pages of text, and notably omitted from a discussion of "groups...[challenged to achieve] respect for each other's goals" (p. 34).

Such a glaring omission is not an isolated incident in the *Journal*; rather, it is characteristic of EPA itself (farmworker protection concerns also received negligible attention in the *Journal's* May 1987 edition on "Pesticides" [Vol. 13, No. 4]).

Farmworkers (substantially Hispanic) will continue to be invisible to EPA policy-makers as long as EPA continues to avoid placing minority employees in substantive, policy-making roles. Hispanic-American employees now make up about one percent of the substantive policy-making positions in EPA, less than 1/2 of one percent of all Senior Executive Service (SES) positions, and none of the SES positions filled in the last three years.

In the absence of input from a balanced management team, EPA will no doubt continue to suffer the lack of credibility so visibly illustrated by the farmworkers' walkout of EPA's "negotiated" farmworker protection rule-making with farm and agrichemical interests. This lack of balance is nowhere more apparent in the relative importance both EPA and the *Journal* apply to protecting endangered species versus protecting minority farmworkers. In many respects, EPA's proposed pesticide endangered species regulations are more protective of the bluntnosed leopard lizard and the snail kite than regulations protecting minority farmworkers.

EPA has taken steps in recent years to improve its recruitment efforts for entry-level positions. However, at the policy-making level, EPA has failed to integrate either its staff or its approach to environmental problems impacting minority population.

Signed,

Sylvia Correa
Alex Varela
Gary Snodgrass-Hortensio
Mario Salazar

Editor's note: As this issue of EPA Journal went to press, the Agency issued proposed new worker protection regulations that revise and expand the farmworker standards originally established by EPA in 1974. The public is invited to comment on these proposed new standards during a formal comment period that closes the first week in October 1988. A story on the national standards being proposed by EPA is planned for a forthcoming issue of the Journal.